UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION

ISABEL ZELAYA, et al.,

Plaintiffs,

No. 3:19-cv-00062-TRM-CHS

v.

CLASS ACTION

ROBERT HAMMER, et al.,

JURY DEMANDED

Defendants.

JOINT MOTION TO EXTEND STAY

On August 31, 2022, the Court entered an order staying all matters in this case through September 9, 2022, to allow the parties sufficient time to finalize a settlement agreement. (Doc. 770.) On September 9, 2022, the parties moved for a further stay through September 19, 2022, which the Court granted on September 13, 2022. (Doc. 772.) The parties continue to work through the class and individual settlement language and associated documents, including a proposed notice, claims forms, and motion for preliminary approval of the class settlement. Accordingly, Counsel for the parties have conferred and jointly request that the Court extend the stay through October 10, 2022.

Respectfully submitted,

NATIONAL IMMIGRATION LAW CENTER

By: /s/ Michelle Lapointe
Michelle Lapointe
P.O. Box 247
Decatur, Georgia 30031
Telephone (213) 279-2508
lapointe@nilc.org

SOUTHERN POVERTY LAW CENTER

Meredith B. Stewart 201 Saint Charles Avenue, Suite 2000 New Orleans, LA 70170 Telephone (504) 486-8982 meredith.stewart@splcenter.org

SHERRARD ROE VOIGT & HARBISON, PLC

William L. Harbison, Tenn. BPR No. 7012 Phillip F. Cramer, Tenn. BPR No. 20697 John L. Farringer, IV, Tenn. BPR No. 22783 150 3rd Avenue South, Suite 1100 Nashville, Tennessee 37201 Telephone (615) 742-4200 bharbison@srvhlaw.com pcramer@srvhlaw.com jfarringer@srvhlaw.com

Counsel for Plaintiffs

MILLER & MARTIN PLLC

By: /s/ Zachary H. Greene
Donald J. Aho, Tenn. BPR No. 11975
Zachary H. Greene, Tenn. BPR No. 24451
Bradford G. Harvey, Tenn. BPR No. 17393
1200 Volunteer Building
832 Georgia Avenue
Chattanooga, Tennessee 37402
Telephone (423) 756-6600
don.aho@millermartin.com
zac.greene@millermartin.com
brad.harvey@millermartin.com

Alexander C. Vey, Tenn. BPR No. 35373 2100 Regions Plaza 1180 West Peachtree Street, NW Atlanta, Georgia 30309 alex.vey@millermartin.com

Counsel for the IRS Planner Defendants

On Behalf and with the Permission of All Defendants